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ment by purchase or eminent domain without the consent of the state legislature the state jurisdiction remains "complete and perfect," subject to the limitation that it cannot be exercised antagonistically to federal governmental interests. *People v. Godfrey*, 17 Johns. (N. Y.) 225. The same is true of land belonging to the federal government at the date of admission of the state in which the land lies and over which Congress has not reserved exclusive jurisdiction. *United States v. Stahl*, 1 Woolw. (U. S. Cir. Ct.) 192. See also 14 OPINIONS, ATTORNEYS GENERAL, 33. The instant case falls within this last rule.

CONSTITUTIONAL LAW — CONTROVERSIES BETWEEN TWO OR MORE STATES — POWER TO MANDAMUS STATE LEGISLATURE. — Argument of the rule to show cause why, in the default of payment of the judgment against West Virginia in favor of Virginia, an order should not be entered directing the levy of a tax by the legislature of West Virginia, and the motion by that state to dismiss the rule. *Held*, the case should be restored to the docket for further argument, such argument to embrace (1) the right to award the madamus prayed for; (2) if not, the power and duty to direct the levy of a tax; (3) if means for doing so be found to exist, the right, if necessary, to apply such other and appropriate remedy by dealing with the funds or taxable property of West Virginia or the rights of that state as may secure an execution of the judgment. *Commonwealth of Virginia v. State of West Virginia*, 38 Sup. Ct. 400.

For a discussion of this case, see Notes, page 1158.

CONSTITUTIONAL LAW — DUE PROCESS — MINIMUM WAGE FOR WOMEN AND MINORS. — The legislative of Minnesota in 1913 passed an act establishing a minimum-wage commission and prohibiting every employer from employing any woman or minor at less than the living wage as determined by order of the commission. Plaintiffs sought to restrain the enforcement of orders of the commission on the ground that the statute was unconstitutional. *Held*, that the act is constitutional. *Williams v. Evans*, 165 N. W. 495 (Minn.).

For a discussion of this case and other cases involving recent labor legislation, see Notes, page 1013.

CONSTITUTIONAL LAW — POWERS OF LEGISLATURE — DELEGATION OF LEGISLATIVE POWER TO BOARD OF HEALTH. — A Massachusetts statute empowered the State board of health to "make rules and regulations to prevent the pollution . . . of all such waters as are used as sources of water supply." (MASS. R. L., c. 75, § 113, as amended by St. 1907, c. 467, § 1.) In pursuance of this authority the board passed a regulation forbidding anyone to fish in a certain lake without a permit. *Held*, that this does not constitute an unconstitutional delegation of legislative power. *Commonwealth v. Hyde*, 118 N. E. 643 (Mass.).

The general proposition that legislative power cannot be delegated is a familiar maxim in American jurisprudence. *Wayman v. Southard*, 10 Wheat. (U. S.) 1. See 19 HARV. L. REV. 203. The basis for the doctrine rests primarily in the express grant in federal and state constitutions of the legislative power to a designated branch of the government. *Prentiss v. Atlantic Coast Line Co.*, 211 U. S. 210; *Winchester, etc. R. Co. v. Commonwealth*, 106 Va. 264, 55 S. E. 692. See *Dreyer v. Illinois*, 187 U. S. 71, 83. In the nature of things, however, no precise demarcation is possible between legislative enactment and mere administrative regulation. See *Chicago, etc. Ry. Co. v. Dey*, 35 Fed. 866, 874. The result is a great confusion among the cases as to what powers may be granted to administrative boards. Cf. *United States v. Louisville, etc. R. Co.*, 176 Fed. 942; *Pierce v. Doolittle*, 130 Ia. 333, 106 N. W. 751; *State v. Carlisle*, 235 Mo. 252, 138 S. W. 513; *State v. Southern R. Co.*,